

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

**RECEIVED**

JUL 27 2000

FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF THE SECRETARY

In the Matter of )

Numbering Resource Optimization )

CC Docket No. 99-200 )

**PETITION FOR WAIVER  
 OF THE  
UNITED STATES TELECOM ASSOCIATION**

The United States Telecom Association (USTA),<sup>1</sup> on behalf of its members, pursuant to Section 1.3 of the Commission's rules,<sup>2</sup> hereby requests that the Commission waive the mandatory reporting requirements set forth in Section 52.15(f) of the rules<sup>3</sup> for a period of 90 days. Thereupon, individual carriers that are unable to comply with the filing requirements could seek further relief individually from the Commission. The mandatory reporting requirements were adopted in the Numbering Resource Optimization Report and Order and Further Notice of Proposed Rule Making in the above-captioned proceeding (Order).<sup>4</sup>

Newly adopted Section 52.15(f) requires all telecommunications carriers that receive numbering resources to report utilization and forecast data semi-annually,

---

<sup>1</sup> The United States Telecom Association, formerly the United States Telephone Association, is the nation's oldest trade organization for the local exchange carrier industry. USTA represents more than 1200 telecommunications companies worldwide that provide a full array of voice, data and video services over wireline and wireless networks. USTA members support the concept of universal service and are leaders in the deployment of advanced telecommunications capabilities to American and international markets.

<sup>2</sup> 47 C.F.R. § 1.3.

<sup>3</sup> 47 C.F.R. § 52.15(f).

<sup>4</sup> FCC 00-104, released March 31, 2000.

No. of Copies rec'd 0+4  
 List A B C D E

---

commencing on August 1, 2000. The utilization data is to be based on new number use categories established recently in the Order adopted in CC Docket No. 99-200. The forecast data in areas where thousand block pooling is implemented is to be reported at the thousand block level per rate center for carriers required to participate in pooling and per NXX level per rate center for carriers not required to participate in pooling. Forecast data in areas where thousand block pooling has not been implemented is to be reported at the NXX level per NPA. These new requirements mean that reporting carriers must make major adjustments in their internal data collection and reporting systems in order to meet the new specifications. Also, the North American Numbering Plan Administrator (NANPA), the designated recipient of the data, must develop the new FCC Form 502, the Numbering Resource Utilization/Forecast (NRUF) Report, make reporting options available to carriers and clarify any questions concerning its requirements and format, and devise a system to collect and analyze the data received. It is USTA's understanding that NeuStar, the current NANPA, only released the specification for the Electronic File Transfer (EFT) Format file on Friday, July 21, 2000. Many larger companies must report their data using this capability.

These factors create a situation that makes it impossible for many of USTA's members to comply with the August 1, 2000 reporting requirement. The Association's Numbering Subcommittee, representative of large, mid-size and small member companies, has determined that relief is necessary. Several individual USTA members have sought waiver or extension of the filing requirements and have fully justified their requests.<sup>5</sup> Such situations exist with many of USTA's members not addressed in the

---

<sup>5</sup> *BellSouth Telecommunications, Inc. Emergency Petition for Partial Waiver and Extension of Time* filed July 24, 2000 (BellSouth Petition); *Petition for Waiver and Extension of Time* filed by

current waiver requests on the record in this proceeding. In addition, other parties representing carriers subject to the reporting obligations have sought similarly justified relief.<sup>6</sup> These requests together substantiate the need for Commission action to extend the August 1, 2000 filing deadline.

In seeking relief, USTA recognizes that individual carriers have their own internal systems for tracking number utilization and forecasting. This means that many carriers will not be able to comply with the requirements for different lengths of time, others will not be able to comply with some of the requirements immediately but will be able to comply with others, and still other carriers may be able to comply with most of the requirements on a timely basis. Because of this situation, USTA believes that the public interest would be served by a waiver of Section 52.15(f) for a period of 90 days.

USTA believes that the 90 day period requested herein would permit its members to fully review their internal system requirements and capabilities, and either complete the reporting sequence or develop a clear assessment of when they can comply. We must also caution that depending on individual carriers' system circumstances, it is possible

---

Cincinnati Bell Telephone Company on July 20, 2000 (Cincinnati Bell Petition); *Qwest Corporation Request for Expedited Deferral of Effective Date or, Alternatively, a Waiver or Stay of Portions of Soon-to-be Effective Rule 47 C.F.R. Section 52.15(f)* filed on July 10, 2000 (Qwest Petition); and *Request for Extension of Time* filed by Puerto Rico Telephone Company, Inc. and Celulares Telefónica, Inc. (PRTC Petition).

<sup>6</sup> *Petition for Extension of Time* filed jointly by the Rural Cellular Association (RCA), the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) and the National Telephone Cooperative Association (NTCA) on July 11, 2000 (RCA/OPASTCO/NTCA Petition); *Motion for Extension of Time* filed jointly by the Association for Local Telecommunications Services (ALTS), Competitive Telecommunications Association (CompTel) and Personal Communications Industry Association (PCIA) on July 14, 2000; *Petition for Temporary Waiver of 47 C.F.R. §§ 52.15(f)(6)(i) and 52.15(j)* filed by VoiceStream Wireless Corporation on July 20, 2000 (VoiceStream Petition); and *Petition for Temporary Waiver of 47 C.F.R. §§ 52.15(f)(6)(i)* filed by Intermedia Communications Inc. (Intermedia Petition).

that some of the granularity required for the period ending June 30, 2000 may not be recoverable for some carriers.

Section 1.3 of the Commission's rules provides that the Commission may waive provisions of its rules "for good cause shown...." According to Commission decisions on this matter, "[g]ood cause requires the showing of two elements: (1) that special circumstances warrant a deviation from the rules, and (2) that such a deviation would serve the public interest."<sup>7</sup>

The situation facing many USTA members justifies a waiver under the above standard. The unique circumstances of these carriers with their internal systems will make adherence to the initial August 1, 2000 reporting requirement inconsistent with the public interest. As more fully described by individual carriers,<sup>8</sup> their existing systems are not designed to accommodate the kind of data collection and reporting required by the newly-adopted rule. The required changes are significant and will require time to implement. It is furthermore documented that the carriers have been working diligently to upgrade their systems to comply with the new rules ever since they were released.<sup>9</sup> However, until these systems are fully operational, many carriers will have to engage in manual processes that would be exceedingly time-consuming and still would not result in compliant data.

---

<sup>7</sup> *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990); *WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972).

<sup>8</sup> BellSouth Petition at 2-4; Cincinnati Bell Petition at 3; Qwest Petition at 4-6; PRTC Petition at 2-3; ALTS/CompTel/PCIA Petition at 5-6; VoiceStream Petition at 2, 5-6; and Intermedia Petition at 3-4.

<sup>9</sup> BellSouth Petition at 3-4; Cincinnati Bell Petition at 3; Qwest Petition at 5; PRTC Petition at 2-3; VoiceStream Petition at 5-6; and Intermedia Petition at 3-4.

The public interest would be served by a temporary waiver. A short delay will not disrupt NANPA's reporting process. In fact, NANPA will not be ready to process the data it collects by August 1. Additional time will certainly yield more useful data and will give NANPA the requisite time to develop the system it needs to effectively and efficiently process the carriers' data. This means that the result will be a more accurate and complete assessment of the utilization of numbering resources in the NANP. Such a result will serve the public interest by achieving the purpose of adopting and implementing the reporting requirements, which is to allow the Commission "to monitor more closely the way numbering resources are used within the NANP."<sup>10</sup>

### **Conclusion**

For the foregoing reasons, USTA urges the Commission to grant a waiver of its number reporting requirements in Section 52.15(f) of the rules and extend the initial

---

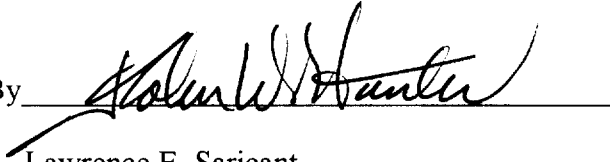
<sup>10</sup> Order at ¶ 5.

filing deadline from August 1, 2000 to November 1, 2000 for carriers to submit utilization and forecast data for the period ending June 30, 2000.

Respectfully submitted,

UNITED STATES TELECOM ASSOCIATION

By

A handwritten signature in black ink, appearing to read "John W. Hunter", is written over a horizontal line.

*Its Attorneys:*

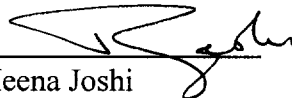
Lawrence E. Sarjeant  
Linda L. Kent  
Keith Townsend  
John W. Hunter  
Julie E. Rones

1401 H Street, N.W.  
Suite 600  
Washington, D.C. 20005  
(202) 326-7375

July 27, 2000

**CERTIFICATE OF SERVICE**

I, Meena Joshi, do certify that on July 27, 2000, Petition Waiver Of The United States Telecom Association was either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the the attached service list

  
\_\_\_\_\_  
Meena Joshi

Jeannie Grimes  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Donald W. Downes  
Glenn Arthur  
Jack R. Goldberg  
Connecticut Department of Public Utility Control  
Ten Franklin Square  
New Britain, CT 06051

John W. Betkoski, III  
Linda Kelly Arnold  
Connecticut Department of Public Utility Control  
Ten Franklin Square  
New Britain, CT 06051

Geraldine Matise  
Network Services Division  
Federal Communications Commission  
2000 M Street, NW  
Room 235  
Washington, DC 20554

Al McCloud  
Federal Communications Commission  
Portals II  
445-12th Street, SW - Room 6A-320  
Washington, DC 20554

Peter Arth, Jr.  
Lionel B. Wilson  
Helen M. Mickiewicz  
PUC of California  
505 Van Ness Avenue  
San Francisco, CA 94102

Larry A. Peck  
Ameritech  
2000 West Ameritech Center Drive  
Room 4H86  
Hoffman Estates, IL 60196

Douglas F. Carlson  
P.O. Box 12574  
Berkeley, CA 94712

Donald L. Dear  
City of Gardena  
P.O. Box 47003  
Gardena, CA 90247

Henry G. Hultquist  
MCI WorldCom  
1801 Pennsylvania Avenue, NW  
Washington, DC 20006

Marc D. Poston  
William K. Haas  
Dan Joyce  
Missouri PSC  
301 West High Street - Room 530  
Jefferson City, MO 65101

Carl K. Oshiro  
Small Business Alliance for Fair Utility Regulation  
100 First Street - Suite 2540  
San Francisco, CA 94105

Bob Pinzler  
South Bay Cities Council of Governments  
5033 Rockvalley Road  
Rancho Palos Verdes, CA 90275

Karlyn D. Stanley  
Cole, Raywid & Braverman, LLP  
(Centennial Cellular Corp.)  
1919 Pennsylvania Avenue, NW - Suite 200  
Washington, DC 20006



Mark J. Burzych  
Foster Swift Collins & Smith, PC  
(Thumb Cellular)  
313 South Washington Square  
Lansing, MI 48933

Susan W. Smith  
Centurytel Wireless, Inc.  
3505 Summerhill Road  
No. 4 Summer Place  
Texarkana, TX 75501

Kenneth E. Hardman  
Moir & Hardman  
(Trillium Cellular)  
1828 L Street, NW - Suite 901  
Washington, DC 20036

Janet Gail Besser  
James Connelly  
Massachusetts Department of Telecomms. and Energy  
One South Station  
Second Floor  
Boston, MA 02110

W. Robert Keating  
Paul B. Vasington  
Eugene J. Sullivan, Jr.  
Massachusetts Department of Telecomms. and Energy  
One South Station - Second Floor  
Boston, MA 02110

Lawrence G. Malone  
NYDPS  
Three Empire State Plaza  
Albany, NY 12223

Robert H. Bennink, Jr.  
Erin K. Duffy  
North Carolina Utilities Commission  
430 N. Salisbury Street  
Raleigh, NC 27603

Michael A. Sullivan  
15 Spencer Avenue  
Somerville, MA 02144

Lynda L. Dorr  
PSC of Wisconsin  
610 N. Whitney Way  
P.O. Box 7854  
Madison, WI 53707

Theresa Fenelon Falk  
Pillsbury Madison & Sutro, LLP  
(Saco River Telegraph and Telco.)  
1100 New York Avenue, NW - Ninth Floor, East Tower  
Washington, DC 20005

Howard J. Symons  
Sara F. Seidman  
Uzoma C. Onyeije  
Mintz, Levin, Cohn, Ferris, Glovsky & Popeo, PC  
(AT&T)  
701 Pennsylvania Avenue, NW - Suite 900  
Washington, DC 20004

Mark C. Rosenblum  
Roy E. Hoffinger  
James H. Bolin, Jr.  
AT&T  
295 North Maple Avenue - Room 3245H1  
Basking Ridge, NJ 07920

Douglas I. Brandon  
AT&T  
1150 Connecticut Avenue, NW  
Suite 400  
Washington, DC 20036

Daniel Mitchell  
Commonwealth of Massachusetts  
200 Portland Street  
Boston, MA 02114

John M. Goodman  
Michael E. Glover  
Bell Atlantic  
1300 Eye Street, NW  
Washington, DC 20005

John F. Raposa, **HQE03J27**  
GTE  
600 Hidden Ridge  
P.O. Box 152092  
Irving, TX 75015

Andre J. Lachance  
GTE  
1850 M Street, NW  
Washington, DC 20036

Katherine M. Harris  
Stephen J. Rosen  
Daniel J. Smith  
Willey, Rein & Fielding  
(PCIA)  
1776 K Street, NW  
Washington, DC 20006

Philip F. McClelland  
Pennsylvania Office of Consumer Advocate  
555 Walnut Street  
Forum Place - Fifth Floor  
Harrisburg, PA 17101

Bruce E. Beard  
Jeanne A. Fischer  
SBC Wireless, Inc.  
13075 Manchester Road  
St. Louis, MO 63131

Joseph Assenzo  
Sprint Corp.  
4900 Main - 11<sup>th</sup> Floor  
Kansas City, MO 64112

Jonathan M. Chambers  
Sprint Corp.  
401 9<sup>th</sup> Steet, NW  
Suite 400  
Washington, DC 20004

Kathryn Marie Krause  
James T. Hannon  
U S WEST  
1020-19th Street, NW  
Suite 700  
Washington, DC 20036

Lee L. Selwyn  
Helen Golding  
Economics and Technology, Inc.  
One Washington Mall  
Boston, MA 02108

James S. Blaszak  
Levine, Blaszak, Block and Boothby, LLP  
(Ad Hoc Telecomm.)  
2001 L Street, NW  
Suite 900  
Washington, DC 20036

Emily M. Williams  
Jonathan Askin  
ALTS  
888-17th Street, NW  
Suite 900  
Washington, DC 20006

Elizabeth G. Kistner  
(ALTS)  
Three Spoede Ridge  
St. Louis, MO 63141

Peggy Arvanitas  
RE/MAX First Class  
621 Bypass Drive  
Clearwater, FL 33764

Michael F. Altschul  
Randall S. Coleman  
Lolita D. Smith  
CTIA  
1250 Connecticut Avenue, NW - Suite 800  
Washington, DC 20036

Cherie R. Kiser  
Gil M. Strobel  
Carlos A. Gutierrez  
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, PC  
(Cablevision Lightpath)  
701 Pennsylvania Avenue, NW - Suite 900  
Washington, DC 20004

Dana Frix  
Swidler, Berlin, Shereff, Friedman, LLP  
(Choice One Comms. & GST Telecomms.)  
3000 K Street, NW  
Suite 300  
Washington, DC 20007

Raymond L. Gifford  
Vincent Majkowski  
Robert J. Hix  
Colorado PUC  
1580 Logan Street, Office Level Two  
Denver, CO 80203

Werner K. Hartenberger  
J.G. Harrington  
Dow, Lohnes & Albertson, PLLC  
(Cox Comms.)  
1200 New Hampshire Avenue, NW  
Suite 800  
Washington, DC 20036

Cynthia B. Miller  
Florida PSC  
Capital Circle Office Center  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399

William P. Hunt, III  
Level 3 Comms., Inc.  
1450 Infinite Drive  
Louisville, CO 80027

David Ellen  
Cablevision Lightpath, Inc.  
1111 Stewart Avenue  
Bethpage, NY 11714

Douglas F. Carlson  
P.O. Box 12574  
Berkeley, CA 94712

Marsha N. Cohen  
2201 Lyon Street  
San Francisco, CA 94115

Larry A. Blosser  
Kemal Hawa  
Swidler, Berlin, Shereff, Friedman, LLP  
(Connect Comms.)  
3000 K Street, NW  
Suite 300  
Washington, DC 20007

Richard Eyre  
P.O. Box 2408  
Tempe, AZ 85280

Richard L. Jones  
INENA  
c/o Loves Park 9-1-1  
540 Loves Park Drive  
Loves Park, IL 61111

Richard M. Rindler  
Ronald W. Del Sesto, Jr.  
Swidler Berlin Shereff Friedman, LLP  
(Level 3 Comms.)  
3000 K Street, NW, Suite 300  
Washington, DC 20007

Edward A. Yorkgitis, Jr.  
Kelley, Drye & Warren, LLP  
(Liberty Teleco)  
1200-19th Street, NW  
Suite 500  
Washington, DC 20036

Reginald N. Todd  
County of Los Angeles  
440 First Street, NW  
Suite 440  
Washington, DC 20001

Trina M. Bragdon  
Maine PUC  
242 State Street  
18 State House Station  
Augusta, ME 04333

Susan M. Eid  
Tina S. Pyle  
Richard A. Karre  
MediaOne Group, Inc.  
1919 Pennsylvania Avenue, NW - Suite 610  
Washington, DC 20006

H. Gilbert Miller  
Mitretek Systems  
Center for Telecommunications and Advanced Technology  
7525 Colshire Drive  
McLean, VA 22102

James R. Hobson  
Donelan, Cleary, Wood & Maser, PC  
(NENA)  
1100 New York Avenue, NW  
Suite 750  
Washington, DC 20005

W. Mark Adams  
NENA  
491 Cheshire Road  
Sunbury, OH 43074

L. Marie Guillory  
Jill Canfield  
NTCA  
4121 Wilson Blvd.  
10<sup>th</sup> Floor  
Arlington, VA 22203

Lawrence G. Malone  
NYDPS  
Three Empire State Plaza  
Albany, NY 12223

Bill Neill  
P.O. Box  
San Diego, CA 92163

John J. Farmer  
New Jersey Board of Public Utilities  
124 Halsey Street  
Fifth Floor  
P.O. Box 45029  
Newark, NJ 07101

Robert S. Foosaner  
Lawrence R. Krevor  
Laura L. Holloway  
Nextel Comms.  
2001 Edmund Halley Drive  
Reston, VA 20191

J.G. Harrington  
Laura Roecklein  
Dow, Lohnes & Albertson, PLLC  
(Nextel Comms.)  
1200 New Hampshire Avenue, NW - Suite 800  
Washington, DC 20036

Daniel M. Waggoner  
Robert Tanner  
Davis Wright Tremaine, LLP  
(NextLink Comms.)  
1500 K Street  
Washington, DC 20005

. Gerard Salemm  
Daniel Gonzalez  
Jason Williams  
Nextlink Comms.  
1730 Rhode Island Avenue, NW - Suite 1000  
Washington, DC 20036

Robert H. Bennink, Jr.  
Erin K. Duffy  
North Carolina Utilities Comm.  
430 N. Salisbury Street  
Raleigh, NC 27603

Betty D. Montgomery  
Duane W. Luckey  
Jodi J. Bair  
Robert A. Abrams  
PUC of Ohio  
180 E. Broad Street - Seventh Floor  
Columbus, OH 43215

Benjamin H. Dickens, Jr.  
Michael B. Adams, Jr.  
Blooston, Mordkofsky, Jackson & Dickens  
(Omnipoint Comms.)  
2120 L Street, NW  
Washington, DC 20037

Judith St. Ledger-Roty  
Todd D. Daubert  
Kelley Drye & Warren, LLP  
(Paging Network)  
1200-19th Street, NW, Suite 500  
Washington, DC 20036

Richard-Michelle Eyre  
REC Networks  
P.O. Box 2408  
Tempe, AZ 82580

Alfred G. Richter, Jr.  
Robert K. Toppins  
John S. DiBene  
SBC Comms.  
1401 I Street, NW, Suite 1100  
Washington, DC 20005

Carol Salva  
632-14th Street  
Santa Monica, CA 90402

Carl K. Oshiro  
Small Business Alliance for Fair Utility Regulation  
100 First Street  
Suite 2540  
San Francisco, CA 94105

Jonathan Chambers  
Sprint PCS  
1801 K Street, NW  
Suite M112  
Washington, DC 20006

Jay Keithley  
Sprint  
1850 M Street, NW  
Suite 1100  
Washington, DC 20036

Joseph Assenzo  
Sprint PCS  
4900 Main Street - 12<sup>th</sup> Floor  
Kansas City, MO 64112

Richard A. Askoff  
Regina McNeil  
NECA  
100 South Jefferson Road  
Whippany, NJ 07981

Alberto Levy  
Melissa Caro  
Texas Office of Public Utility Counsel  
1701 N. Congress - Suite 9-180  
P.O. Box 12397  
Austin, TX 78711

Michael Travieso  
NASUCA  
1133-15th Street, NW  
Suite 550  
Washington, DC 20005

Brian Thomas O'Connor  
Robert A. Calaff  
VoiceStream Wireless Corp.  
1300 Pennsylvania Avenue, NW, Suite 700  
Washington, DC 20004

Gilbert J. Yablon  
SMART Dialing Systems  
21914 Dumetz Road  
Woodland Hills, CA 91364

David L. Heaton  
Office of the State's Attorney - Cook County, Illinois  
Public Interest Bureau  
69 West Washington  
Chicago, IL 60602

Howard J. Symons  
Sara F. Seidman  
Amy Bushyeager  
Mintz, Levin, Cohn, Ferris, Glovsky & Popeo, PC  
701 Pennsylvania Avenue, NW - Suite 900  
Washington, DC 20004

Pamela J. Riley  
David A. Gross  
AirTouch Comms.  
1818 N Street, NW - Suite 800  
Washington, DC 20036

Dawn Hunt  
Rogers Cantel, Inc.  
333 Bloor Street East  
Toronto, Ontario  
M4W 1G9  
Canada

Brian Conboy  
Thomas Jones  
David Don  
Willkie Farr & Gallagher (Time Warner Turner)  
1155-21st Street, NW  
Washington, DC 20036

Judith St. Ledger-Roty  
Todd D. Daoubert  
Jennifer Kashatus  
Kelley Drye & Warren, LLP  
1200-19th Street, NW, Fifth Floor  
Washington, DC 20036

Teresa K. Gaugler  
Jane Kunka  
Qwest  
4250 North Fairfax Drive  
Arlington, VA 22203

James Bradford Ramsay  
NARUC  
1100 Pennsylvania Avenue, NW  
Suite 603  
Washington, DC 20004

Mark C. Rosenblum  
Roy E. Hoffinger  
James H. Bolin, Jr.  
AT&T  
295 North Maple Avenue - Room 3245H1  
Basking Ridge, NJ 07920

Don Woodford  
Mobility Canaca  
1420 Blair Place  
Suite 800  
Gloucester, Ontario K1J 9L8  
Canada

ITS  
1231-20th Street, NW  
Washington, DC 20036

Brian Conboy  
Thomas Jones  
Christi Shewman  
Willkie Farr & Gallagher  
3 Lafayette Centre  
1155 21<sup>st</sup> Str. NW  
Washington, D.C. 20036

Russell C. Merbeth  
Daniel F. Gonos  
Winstar Communications, Inc.  
1615 L Street, NW, Suite 1260  
Washington, DC 20036

Robert L. Hoggarth  
Harold Salters  
Personal Communications Industry Assoc.  
500 Montgomery Str. Suite 700  
Alexandria, VA 22314-1561

John T. Scott, III  
Verizon Wireless  
1001 Pennsylvania Ave., NW  
Washington, DC 20004-2595

Deanne M. Brutts  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Teya M. Penniman  
Oregon Public utility Commission  
Department of Justice  
1162 Court Street NE  
Salem, OR 97310

New Hampshire Public Utilities Commission  
E. Barclay Jackson, Esq.  
8 Old Suncook Road  
Concord, NH 03301

Michael F. Altschul  
Cellular Telecommunications Industry Assoc.  
1250 Connecticut Avenue, NW  
Suite 800  
Washington, DC 20036

George N. Barclay  
Michael J. Ettner  
General Services Administration  
1800 F Street, NW, Rm. 4002  
Washington, DC 20405

M. Robert Sutherland  
Angela N. Brown  
Bellsouth Corp.  
1155 Peachtree Street, NE, Suite 1700  
Atlanta, GA 30309-3510